

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

GREAT NORTHERN RESOURCES, INC.,  
DYNAMIC SERVICE FIRE AND SECURITY,  
LLC, and WALTER VAN LEJA, on behalf of  
themselves and others similarly situated,

Plaintiffs,

v.

KATY COBA, in her Official Capacity as State  
Chief Operating Officer and Director of the  
OREGON DEPARTMENT OF  
ADMINISTRATIVE SERVICES; OREGON  
DEPARTMENT OF ADMINISTRATIVE  
SERVICES; THE CONTINGENT; BLACK  
UNITED FUND OF OREGON and DOES 1-  
10,

Defendants.

Case No.: 3:20-cv-01866-IM (Lead Case)  
Case No.: 3:20-cv-02022-IM (Trailing Case)

**SUPPLEMENTAL DECLARATION OF  
VICTORIA URDANETA**

Hearing Date: June 21, 2021  
Time: 2:00 p.m.  
Judge: Hon. Karin J. Immergut  
Courtroom: 13A

I, Victoria Urdaneta, declare as follows:

1. I am the Assistant Director of Operations at Settlement Services, Inc. (“SSI”). The following statements are based on my personal knowledge and information provided by other SSI employees working under my supervision, and, if called on to do so, I could and would testify competently thereto.

2. SSI is serving in this matter as the Settlement Administrator in the Action for the purposes of administering the Class Action Settlement, preliminarily approved in the Court’s Order dated March 19, 2021. I submit this Declaration in order to provide the Court and the Parties to this Action with information regarding SSI’s work in accordance with the Court’s Order.

3. **Requests for Exclusion.** The deadline for Class Members to request exclusion from the class was a postmark deadline of May 28, 2021. SSI received four timely and valid requests for exclusion, and their names are as follows:

- a. Nimalsiri Pallegage Kapuralalage
- b. Didina Fakashchuk
- c. Anna Fakashchuk
- d. Cocina Cultura LLC, dba Revolucion Coffee House

As noted in my previous declaration, SSI previously received twelve (12) invalid requests for exclusion, and followed up with those Class Members to let them know how to properly exclude themselves from the class. ECF No. 121, ¶ 9. Since that time, SSI received one untimely request for exclusion, which was postmarked on June 2, 2021, five days after the Court-ordered deadline.

4. **Objections.** The deadline for Class Members to object to the Settlement was a postmark deadline of May 28, 2021. As of the date of this declaration, SSI has received no objections, timely or otherwise.

5. **Compliance With Additional Deadlines from Preliminary Approval Order.** On May 12, 2021, Plaintiff filed a motion for final approval of the Settlement and an application for attorneys’ fees, costs, and expenses and for the Service Award. ECF Nos. 107–112. On May 13, 2021, Class Counsel provided copies of those filings to the Settlement Administrator for posting on the Settlement Website, and SSI posted the materials the same day. *See Preliminary Approval*

Order, ECF No. 94, at ¶ 7.

6. On June 3, 2021, SSI provided the Settling Parties with copies of all completed opt-out notifications and a final list of all who had timely and validly excluded themselves from the Settlement Class. *See* Preliminary Approval Order, ECF No. 94, at ¶ 6. True and correct copies of the opt-out notifications and list provided by the Settlement Administrator are respectively attached as Exhibit 1 and Exhibit 2 to this declaration. In total, the Settlement Administrator received four timely and valid opt-out notifications from Class Members.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed June 10, 2021, in Tallahassee, Florida.



VICTORIA URDANETA

# **EXHIBIT 1**

Nimalsiri Pallegage Kapuralalage  
7297SE Lindsay Ln  
Hillsboro OR97123

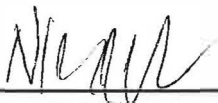
Received  
APR 19 2021  
SSI

GNR v. Coba Settlement Administrator,  
Post Office Box 10269,  
Tallahassee, FL 32302-2269

Case No. 3:20-cv-01866-IM (L) (D. Or.),

My New address is 7297SE Lindsay Ln Hillsboro OR 97123 and my old address was 12270SW  
Center St Apt38 Beaverton OR 97005.

I, Nimalsiri Pallegage Kapuralalage, want to exclude myself from the settlement of *Great  
Northern Resources, Inc., et al. v. Coba, et al.*, Case No. 3:20-cv-01866-IM (L) (D. Or.),



Nimalsiri Pallegage Kapuralalage  
(Signature)

Sincerely  
Nimalsiri Pallegage Kapuralalage

Nimalsiri Pathiraja Kapurathuge  
7297SE Lindsay Ln  
Hillsboro OR 97123

Received  
APR 19 2021

SSI

GNR V. Coba settlement Administrator  
Post office Box 10269  
Tallahassee, FL 32302-2269





GUR V. cobra  
Settlement Administrator  
PO Box 10269,  
Tallahassee, FL 32302-2269

Case # 3:20-CV-01866-IM(L)(D. or.)

I, Didina Fakashchuk exclude myself  
from this Settlement.

I was not aware of this, this was  
done without my permission



Didina Fakashchuk  
15220 SE Stark St, Apt 7  
Portland, OR 97233

Received

MAY 28 2021

SSI

Cocina Cultura LLC  
DBA Revolucion Coffee House  
c/o Michelle A. Scott  
Center for Individual Rights  
1100 Connecticut Ave., NW  
Suite 625  
Washington, DC 20036

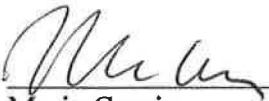
GNR v. Coba Settlement Administrator  
Post Office Box 10269  
Tallahassee, Florida 32302-2269

Via US Priority Mail

To Whom It May Concern:

On behalf of Cocina Cultura, LLC, DBA Revolucion Coffee House, I, Maria Garcia (its owner), wish to be excluded from the Settlement in *Great Northern Resources, Inc., et al. v. Coba., et al.*, Case No. 3:20-cv-01866-IM (L) (D. Or.).

Signed this 24 Day of May 2021



Maria Garcia  
Owner, Cocina Cultura LLC  
DBA Revolucion Coffee House



M

Cocina Cultura LLC  
1432 SW 6th Avenue  
Portland, OR 97201



LN  
5-28-21

Received  
MAY 28 2021  
SSI

GNR v. Caba Settlement Administrator  
Post Office Box 10269  
Tallahassee, Florida 32302-2269

Received

APR 27 2021

SSI

GMR v. Coba  
Settlement Administrator  
PO Box 10269,  
Tallahassee, FL 32302-2269

Case # 3:20-cv-01866-IM(L) (D.Or.)

I, Anna Fakashchuk exclude myself  
from this settlement.

I was not aware of this, this was  
done without my Permission.



Anna Fakashchuk

15220 SE Stark St, Apt 7  
Portland, OR 97233

## **EXHIBIT 2**

CM ID	fname	Iname	OptOut Received	OptOut Received Date	Class Member
0031	Nimalsiri	Pallebage Kapuralalage	x	041921	X
0639	Didina	Fakashchuk	x	042721	X
0641	Anna	Fakashchuk	x	042721	X
1229		Cocina cultura LLC DBA Revolucion Coffee house	x	052821	X

CM ID	fname	Iname	OptOut Received	OptOut Received Date	Class Member	Follow Up
0071	Sarifa	Phanchy	i	040821	X	Opt Out Cure Letter (via Email)
0286	Sandra	Fanucchi	l	042121	X	Opt Out Cure Letter (via Email)
0495	Odalys	Pineda	l	040921	X	Opt Out Cure Letter (via Email)
0815	Rosaleea	Garcia	i	040821	X	Opt Out Cure Letter (via Email)
0923	Carol	Rihsa	i	040821	X	Opt Out Cure Letter (via Email)
0930	Neil Yancy	Travilla	i	040821	X	Opt Out Cure Letter (via Email)
0933	Aamina	Ali Ahmed	i	040821	X	Opt Out Cure Letter (via Email)
1099	Javier	Saiz	i	040821	X	Opt Out Cure Letter (via Email)
1150	Celeste	Pulido Garcia	l	041221	X	Opt Out Cure Letter (via Email)